

EXHIBIT

13

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
INC., *et al.*,

Plaintiffs,

v.

CITY OF MYRTLE BEACH, *et al.*,

Defendants.

Civil Action No. 4:18-cv-00554-DCC

DECLARATION OF LARRY GRAHAM

I, Larry Graham, hereby state as follows:

1. I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth herein.

2. I am African American. I live in Angier, North Carolina.

3. I first attended Black Bike Week in 2009 or 2010 and I have attended Black Bike Week every year for the last seven or eight years.

4. I was glad to hear about the lawsuit that the NAACP filed against the City of Myrtle Beach because I would like to see the City's treatment of Black Bike Week change. After hearing about the lawsuit, I contacted the NAACP to let them know about my negative experiences during Black Bike Week.

5. Going to Black Bike Week has been a tradition of mine for many years. I always go with a friend of mine or with my motorcycle club. During the day, I enjoy cruising on my

bike down Ocean Boulevard and going out to the restaurants and bars with my friends and my bike club at night.

6. I have noticed differences in Black Bike Week over the last few years I have attended the event. Over time, there have been more police officers and the traffic has gotten much worse with more roads blocked.

7. When I come to Myrtle Beach for Black Bike Week, I prefer to stay in a hotel in Conway because it's a little quieter and the rooms are nicer. Under normal traffic conditions, my hotel is usually about a ten-minute drive from Ocean Boulevard where the rest of my bike club stays.

8. Because of the one-way traffic loop that has been in place on the weekend since 2015, I take a few extra vacation days from work in order to get to Myrtle Beach on Wednesday, a few days before the loop goes into place. Once the one-way loop is in place, I know that I cannot freely move around the city, and even though it is an event for bikers, I don't ride my bike when the loop is in place because I don't want to be stuck with my bike in traffic for hours.

9. In both 2015 and 2016, I noticed that the traffic was much more restrictive than usual because the City had put in place the 23-mile one-way loop, but because I stayed near Atlantic Beach in 2015 and did not try to drive down Ocean Boulevard, I was able to avoid the traffic loop.

10. In 2016, I stayed in Conway and I got stuck in the traffic loop while I was trying to get back to my hotel around midnight on the Saturday of Black Bike Week after visiting my friends on Ocean Boulevard. My hotel was in sight, and I pulled over to the side of the road to ask the officer if I could get through the barrier to reach my hotel. Without listening to me, the officer yelled "keep moving" and shined a flashlight into my car as if I were doing something

wrong. I was forced to keep driving past my hotel and continue on the one-way loop all the way past the airport before I finally made it through a barrier to my hotel. Even though I was seconds from my hotel when I pulled over, I was redirected into the loop for an extra two hours, and could not reach the hotel until after the loop ended at 2am. It was extremely frustrating and dehumanizing to have so many police officers treating me as if I were doing something wrong.

11. When I attended Black Bike Week in 2017, I stayed at the Harbor Lights Hotel in Myrtle Beach. The drive to meet my motorcycle club on Ocean Boulevard should have only taken fifteen minutes, but because I was traveling on the weekend after 10pm, I got stuck in the loop, and did not reach my friends until after midnight. The traffic was so slow that I had to get off my motorcycle. The traffic made my vacation frustrating and unpleasant.

12. After these experiences, I now adjust my schedule during Black Bike Week to avoid driving while the loop is in place on the weekend. This means that if I go out with my friends on Ocean Boulevard, I can't go back to my hotel until after 2am when the loop stops. It's my vacation, and I wish I could go out and in as I please, but the loop makes me feel trapped.

13. I have also been to Myrtle Beach for Labor Day Weekend four or five times. Compared to Black Bike Week, the experience is night and day. Even though Black Bike Week is for bikers, in reality I have a much better biking experience when I go to Myrtle Beach for Labor Day. Even though it's still a busy tourist weekend, the roads are actually open to ride, there's no traffic loop, and I barely notice that the police are there. I've never been yelled at or reprimanded by the police when I travel to Myrtle Beach during Labor Day Weekend.

14. I plan to attend Black Bike Week 2018 because I enjoy spending time with my friends and fellow bikers. However, I think that the traffic loop and police presence has started to

keep some people from attending Black Bike Week. During Black Bike Week, the City feels unfriendly and the traffic patterns and police presence make attendees like me want to leave.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED WITHIN THE UNITED STATES ON: April 5, 2018.

BY: Larry Graham
Larry Graham